

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

HANIEFF A. TRUSTY

Crim. No. 20- **543 (JHR)**

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
18 U.S.C. § 922(g)(1)

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Camden, charges:

COUNT ONE

(Possession with Intent to Distribute a Controlled Substance)

On or about January 14, 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

HANIEFF A. TRUSTY,

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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AT 8:50 **530** PM
WILLIAM T. WALSH
CLERK

COUNT TWO

(Unlawful Possession of a Firearm by a Previously Convicted Offender)

On or about January 14, 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

HANIEFF A. TRUSTY,

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year in a court in the State of New Jersey, did knowingly possess a firearm, namely one Smith and Wesson .40 caliber semi-automatic pistol, Model SW40VE, bearing serial number RCA1423, and fourteen (14) rounds of assorted .40 caliber ammunition, and the firearm was in and affecting interstate commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 922(g)(1), set forth in Count 2 of this Indictment, the defendant,

HANIEFF A. TRUSTY,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the commission of the offense, including, but not limited to, the following:

- (i) One (1) Smith and Wesson .40 caliber semi-automatic pistol, Model SW40VE, bearing serial number RCA1423; and
- (ii) Fourteen (14) rounds of assorted .40 caliber ammunition.

Substitute Assets Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A TRUE BILL


FOREPERSON

Craig Carpenito/mf

CRAIG CARPENITO
United States Attorney

CASE NUMBER: 2020R00481

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

HANIEFF A. TRUSTY

INDICTMENT FOR

**21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
18 U.S.C. § 922(g)(1)**

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